

J. RANDALL JONES, ESQ. (#1927)  
 r.jones@kempjones.com  
 KEMP, JONES & COULTHARD, LLP  
 3800 Howard Hughes Parkway  
 Seventeenth Floor  
 Las Vegas, Nevada 89169  
 Telephone: (702) 385-6000  
 Facsimile: (702) 385-6001  
*Attorney for Defendants*

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

DEAN KROGSTAD, on behalf of himself  
 and all others similarly situated,

Plaintiff,

v.

NATIONWIDE BIWEEKLY  
 ADMINISTRATION, INC. and LOAN  
 PAYMENT ADMINISTRATION LLC,

Defendants.

Case No. 2:16-CV-00465-APG-CWH

**STIPULATION AND ORDER TO EXTEND  
 TIME FOR DEFENDANTS TO RESPOND  
 TO THE COMPLAINT**

**(FIRST REQUEST)**

COME NOW, Defendants Nationwide Biweekly Administration, Inc., and Loan Payment Administration, LLC (collectively, "Defendants"), by and through their counsel, Kemp, Jones & Coulthard, LLP, and Markovits, Stock & DeMarco, LLC, and Plaintiff Dean Krogstad, on behalf of himself and others similarly situated, by and through counsel, Muehlbauer Law Office, Ltd., and Pomerantz LLP, pursuant to Local Rule 6-1, and hereby stipulate, agree, and make a joint application to extend the time within which Defendants may file an answer or otherwise respond to Plaintiff's Complaint. Pursuant to FRCP 12(a), Defendants currently have until April 4, 2016, to answer or otherwise respond to the Complaint. This extension is requested because local counsel for Defendants was only recently retained and thus additional time is needed to respond to the Complaint.

KEMP, JONES & COULTHARD, LLP  
 3800 Howard Hughes Parkway  
 Seventeenth Floor  
 Las Vegas, Nevada 89169  
 (702) 385-6000 • Fax (702) 385-6001  
 kjc@kempjones.com

Based upon the foregoing, the parties request that this Court order that the time for Defendants to answer or otherwise respond to Plaintiff's Complaint be extended to and include **April 18, 2016**.

DATED this 31<sup>st</sup> day of March, 2016.

DATED this 31<sup>st</sup> day of March, 2016.

KEMP JONES & COULTHARD, LLP

MUEHLBAUER LAW OFFICE, LTD.

/s/ J. Randall Jones

/s/ Andrew R. Muehlbauer

J. Randall Jones, Esq. (#1927)  
3800 Howard Hughes Parkway, 17<sup>th</sup> Floor  
Las Vegas, Nevada 89169  
Telephone: (702) 385-6000  
Facsimile: (702) 385-6001

7915 West Sahara Ave., Suite 104  
Las Vegas, NV 78117  
Tel: (702) 330-4505  
Fax: (702) 825-0141  
Email: andrew@mlollegal.com

MARKOVITS, STOCK & DEMARCO LLC

POMERANTZ LLP

Bill Markovits (to be admitted pro hac vice)  
119 East Court Street, Suite 530  
Cincinnati, Ohio 45202  
Tel: (513) 651-3700  
Fax: (513) 665-0219  
Email: bmarkovits@msdlegal.com  
*Attorneys for Defendants*

Gustavo F. Bruckner (to be admitted pro hac vice)  
600 Third Ave.  
New York, NY  
Tel: (212) 661-1100  
Fax: (917) 463-1044  
Email: gfbruckner@pomlaw.com

Jayne A. Goldstein (to be admitted pro hac vice)  
1792 Bell Tower Lane, Suite 203  
Weston, FL 33326  
Tel: (561) 270-0795  
Fax: (954) 315-3454  
Email: jagoldstein@pomlaw.com

Perry Gattegno (to be admitted pro hac vice)  
10 S. LaSalle, Suite 3505  
Chicago, IL 60603  
Tel: (312) 377-1181  
Fax: (312) 377-1184  
Email: pgattegno@pomlaw.com  
*Counsel for Plaintiff and the Proposed Class*

### ORDER

IT IS SO ORDERED:

DATED: April 4, 2016

  
United States Magistrate Judge